

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re: ) Chapter 11  
Squirrels Research Labs LLC, *et al.*<sup>1</sup> )  
Debtors. ) Case No. 21-614  
 ) (Jointly Adminis  
 )  
 ) Judge Russ Kend  
 )

**SQUIRRELS RESEARCH LABS LLC'S MOTION TO EXTEND CERTAIN DEADLINES AND CONTINUE CONFIRMATION HEARING**

Squirrels Research Labs LLC (“SQRL”), one of the above-captioned debtors and debtors in possession, files this *Motion to Extend Certain Deadlines and Continue Confirmation Hearing* (the “Motion”). In support of this Motion, SQRL respectfully represents as follows:

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. On November 23, 2021, SQRL and The Midwest Data Company LLC (collectively with SQRL, the “Debtors”) each filed a voluntary petition for relief under Subchapter V of Chapter 11 of the Bankruptcy Code. The Debtors’ cases were jointly administered for procedural purposes.

3. SQRL filed its *Plan of Liquidation* (Doc. #169) (the “Plan”) on February 21, 2022.

4. On March 14, 2022, the Court entered an *Order on Motion for Establishment of Applicable Hearing Dates and Deadlines for Plan of Liquidation* (Doc. #183) (the “Procedures Order”). The Procedures Order established April 25, 2022 as the deadline for objections to the

<sup>1</sup> The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

Plan, May 2, 2022 as the deadline for SQRL to file its Brief in Support of Confirmation and replies to objections, and May 24, 2022 as the date of the Confirmation Hearing.

5. On April 6, 2022, Torea Consulting, Ltd. (“Torea”) filed its *Objection to Chapter 11 Plans filed by Squirrels Research Labs, LLC and the Midwest Data Company LLC* (Doc. #209). No other Plan objections were filed.

6. On April 25, 2022, the *Report of Subchapter V Trustee and Statement Concerning Confirmation of Squirrels Research Labs LLC Plan* (Doc. #219) (the “Trustee Report”) was filed. Although not styled as an objection, the Trustee Report raises numerous questions about SQRL’s Plan.

7. SQRL needs additional time to address the questions raised in the Trustee Report, which may require the filing of an amended plan. Accordingly, SQRL asks the Court, pursuant to Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure, to extend the deadline for SQRL to file its Brief in Support of Confirmation and reply to confirmation objections to June 2, 2022. SQRL also asks the Court to continue the Confirmation Hearing to June 28, 2022, at 2:00 p.m. (EST). Torea and the Trustee do not object to the relief requested in this Motion.

8. In addition, SQRL asks the Court, pursuant to Rule 9006(c)(1), to bypass the fourteen (14) days’ notice requirement in Local Bankruptcy Rule 9013-1(a) for this Motion.

WHEREFORE, for the reasons set forth in this Motion, SQRL respectfully requests that this Court enter an Order, substantially in the form as the attached Exhibit A, (i) granting the Motion, (ii) extending the deadline for SQRL to file its Brief in Support of Confirmation and reply to objections to June 2, 2022, (iii) continuing the Confirmation Hearing to June 28, 2022, at 2:00 p.m. (EST), and (iv) granting such other and further relief as is just and proper.

Dated: April 28, 2022

Respectfully submitted,

/s/ Julie K. Zurn

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**CERTIFICATE OF SERVICE**

I, Julie K. Zurn, hereby certify that on April 28, 2022, a true and correct copy of *Squirrels Research Labs LLC's Motion To Extend Certain Deadlines And Continue Confirmation Hearing* was served via the court's Electronic Case Filing System on the entities and individuals who are listed on the court's Electronic Mail Notice List:

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